

EXHIBIT 19

21 Reported by:
22 NADIA NEWHART, CSR No. 8714
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,)

JEREMY DAVIS, CHRISTOPHER)

CASTILLO, and MONIQUE)

TRUJILLO, individually and)

on behalf of all other)

similarly situated,))

Plaintiffs,) Case No.

vs.) 4:20-cv-03664-YGR-SVK

GOOGLE LLC,)

Defendant.)

)

Remote videotaped deposition of

GEORGIOS ZERVAS, Ph.D., Volume I, taken on behalf of Plaintiffs, with all participants appearing remotely via videoconference and the witness testifying from Boston, Massachusetts, beginning at 10:05 a.m. and ending at 3:41 p.m. on Monday, August 22, 2022, before NADIA NEWHART, Certified Shorthand Reporter No. 8714.

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1 Q Understood. So at that point, I want to make
2 sure that Google doesn't see what I do when I'm on
3 non-Google websites. I don't want them to collect
4 anything that I do, clicks, rendering of pages or
5 any other activity.

12:16:17

6 What cookie setting would I enable to prevent
7 that?

8 A Okay. There -- it's a complex question, so
9 let me get some time to answer.

10 So first of all, you're imagining that 12:16:35
11 they're going to a first-party site -- let's call it
12 newyorktimes.com. And then, what, the site uses
13 third-party services by Google and you're in
14 incognito; is that the setting?

15 Q I'll take that example, sure.

12:16:48

16 A All right. And then you want no
17 communications whatsoever to Google. Do I
18 understand correctly? That's what you said, I
19 think.

20 Q I'll take your example.

12:17:02

21 A Okay. So first of all, this falls outside,
22 you know, I believe, the interpretation of what I
23 see on this black screen of what incognito provides.
24 So this is not, you know -- incognito is not about
25 blocking indiscriminately any transmissions to

12:17:25

1 Google. And, in fact, my understanding is that
2 neither are other private browsing modes of other
3 browsers.

4 So now we are in the land of you wanting to
5 accomplish something very specific and special. And 12:17:41
6 I think some of my exhibits, again, speak to that
7 regard. So if I look at -- I have not provided a
8 specific test that blocks everything, but this could
9 be -- based on my professional experience,
10 potentially it is to accomplish -- for instance, if 12:17:58
11 you look at my discussion of uBlock, one of the
12 extensions that I discuss, if I recall correctly,
13 you can have custom filters. A filter is simply
14 something that matches communication patterns, and
15 it says, I don't want this to happen. 12:18:16

16 So if you were -- if you had that specific
17 need for whatever purpose, you could use this
18 extension, and then that would block communications
19 to Google assuming you configured it correctly.

20 Q And I think in your report, which is 12:18:30
21 paragraph 114 where it's either uBlock or micro
22 block -- I'm not sure if they use the u in that way,
23 but either way, paragraph 114, you describe how that
24 can block Ad Manager, correct?

25 A I've been calling it uBlock forever, but it 12:18:54

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were placed under oath; that a
8 record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; further, that the foregoing is
11 an accurate transcription thereof.

12 I further certify that I am neither
13 financially interested in the action nor a relative
14 or employee of any attorney of any of the parties.

15 IN WITNESS WHEREOF, I have this date
16 subscribed my name.

17
18 Dated: August 24, 2022

19
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21 Nadia Newhart

22 NADIA NEWHART

23 CSR No. 8714